

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA

PRESIDENT DONALD J. TRUMP, 45th President of the United
States of America, in his individual capacity,
Plaintiff,

v.

SIMON & SCHUSTER, INC., a New York corporation,
ROBERT WOODWARD p.k.a. BOB WOODWARD, an
individual, and PARAMOUNT GLOBAL, a Delaware
corporation, f/k/a Viacom Inc., successor by merger to CBS
Corporation, a Pennsylvania corporation f/k/a
Westinghouse Electric Corporation,
Defendants.

3:23-cv-02333-RV-ZCB

PLAINTIFF'S MOTION TO SEAL CERTAIN DOCUMENTS
CONTAINING CONFIDENTIAL INFORMATION

Plaintiff, President Donald J. Trump ("Plaintiff"), by and through its undersigned counsel, hereby moves this Honorable Court for an order sealing certain documents containing identifying sales data identified by Defendants as being , and as grounds therefore states as follows:

1. This is a proceeding arising out of the Copyright Act concerning certain specified audio recordings, an audio tape and subsequent derivative works.
2. Good cause to seal the documents that are the subject of this Motion to Seal pursuant to the requirements of Local Rule 5.5., that has been followed, is set forth herein.
3. Pursuant to N.D. Fla. L.R. 5.5 (C), Plaintiff moves this Court for an order

sealing the following documents: Exhibit E to the Declaration of Robert Garson in opposition to the motions to dismiss Pursuant To Rule 12(B)(6) or, In The Alternative, To Transfer For Improper Venue and incorporated memorandum of law.

4. Here, good cause exists to keep the documents requested under seal from the public as they have been designated Confidential by the Defendants pursuant to the Stipulation And Confidentiality Agreement [Doc. 41-1].

5. Plaintiff requests that the documents that are the subject of this Motion remain under seal until the Court orders otherwise.

WHEREFORE, Plaintiff President Donald J. Trump respectfully prays that this Court enter an Order directing the clerk of court to seal the following documents on filing: Exhibit E to the Declaration of Robert Garson in opposition to the motions to dismiss Pursuant To Rule 12(B)(6) or, In The Alternative, To Transfer For Improper Venue and incorporated memorandum of law.

Dated: June 30, 2023
Aventura, Florida

GS2 LAW PLLC

By: /s/ Robert Garson
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CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2023, I filed the foregoing Motion, which will send an electronic notice to counsel of record per the service list below.

/s/ Robert Garson

Service List

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